

EXHIBIT G

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JEAN JONES,	§	
	§	
PLAINTIFF	§	CASE NUMBER: 1:16-cv-00572-RP
	§	
v.	§	
	§	
PORTFOLIO RECOVERY ASSOCIATES,	§	Honorable Robert Pittman
LLC, and WESTERN SURETY CO.,	§	
	§	
DEFENDANTS.	§	

**DECLARATION OF PAULA PIERCE
IN SUPPORT OF PLAINTIFF'S PETITION FOR ATTORNEYS' FEES**

I, Paula Pierce, declare the following under penalty of perjury:

1. I am an attorney living and working in Austin, Travis County, Texas. My Texas State Bar Number is 15999250. I am admitted to practice before the United States District Court for the Western District of Texas and the United States Court of Appeals for the Fifth Circuit.

2. I graduated *summa cum laude* from the South Texas College of Law in 1986, was admitted to the Texas bar, and served as a briefing attorney to the Supreme Court of Texas before joining various law firms in private practice. I also served as a staff attorney and managing attorney at Texas Legal Services Center before starting my solo practice. I currently maintain a solo legal practice, P. Pierce Law, P.C., located in Austin, Texas. I have handled cases for consumers during my entire legal career. I am currently Chair Elect of the Consumer and Commercial Law Section of the State Bar of Texas, and I am the Course Director of the State Bar of Texas' continuing legal education program Advanced Consumer & Commercial Law 2020. I am a member of the National Association of Consumer Attorneys, the Austin Bar Association, and the Robert W. Calvert Inn of Court where I serve on the Inn's Executive Committee. I have experience in consumer litigation

and appeals in both federal and state courts. I am familiar with litigating issues under the FDCPA and TDCPA.

3. I am familiar with the reasonable and necessary attorneys' fees in Austin, Travis County, Texas.

4. I have reviewed the Declaration of Celetha C. Chatman describing her qualifications, experience, and her legal work on behalf of Plaintiff. In my opinion, Celetha C. Chatman's hourly rate of \$335.00 is reasonable in Travis County, Texas. It is my further opinion that the services performed by Ms. Chatman on behalf of Plaintiff as reflected in the time and expense report attached to her declaration were necessary to Plaintiff's representation considering the nature and complexity of the case.

5. I have reviewed the Declaration of Michael Jacob Wood describing his qualifications, experience, and the services he rendered on behalf of Plaintiff. In my opinion, Michael Jacob Wood's hourly rate of \$372.00 is reasonable in Travis County, Texas. It is my further opinion that the legal services performed by Mr. Wood on behalf of Plaintiff as reflected in the time and expense report attached to his declaration were necessary to Plaintiff's representation considering the nature and complexity of the case.

6. I have reviewed the Declaration of Amy Clark wherein Ms. Clark describes her experience and qualifications as well as the legal services she rendered to the Plaintiff. In my opinion, Amy Clark's hourly rate of \$400.00 is reasonable in Travis County, Texas. It is my further opinion that the legal services performed by Amy Clark on behalf of Plaintiff as reflected in the time and expense report attached to her declaration were necessary to Plaintiff's representation considering the nature and complexity of the case.

7. I have reviewed the Declaration of Daniel Brown describing his experience and qualifications as well as the legal services he rendered to the Plaintiff. In my opinion, Daniel Brown's hourly rate of \$425.00 is reasonable for appellate attorneys in Travis County, Texas. It is my further opinion that the legal services performed by Daniel Brown on behalf of Plaintiff as reflected in the time and expense report attached to his declaration were necessary to Plaintiff's representation considering the nature and complexity of the case.

Pursuant to 28 U.S.C. § 1746(2), I, Paula Pierce, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 3, 2020

/s/ Paula Pierce
Paula Pierce